UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

MAUNE RAICHLE

HARTLEY

FRENCH & MUDD, LLC

Clayton L. Thompson, Esq.

cthompson@mrhfmlaw.com

Suzanne M. Ratcliffe, Esq.

sratcliffe@mrhfmlaw.com

150 West 30th Street, Suite 201

New York, New York 10001

Tel: (800) 358-5922

Attorneys for M<u>esothelioma</u> Claimants Katherine Tollefson, Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine

Woodfin

COONEY & CONWAY

Kathy Byrne, Esq.

kbyrne@cooneyconway.com

120 N. LaSalle Street, Suite 3000

Chicago, Illinois 60602

Tel: (312) 236-6166

Attorneys for Mesothelioma Claimant Giovanni

Sosa

*Admitted Pro Hac Vice

LEX NOVA LAW, LLC

E. Richard Dressel, Esq.

rdressel@lexnovalaw.com

10 E. Stow Road, Suite 250

Marlton, New Jersey 08053

Tel: (856) 382-8211

 $Attorneys\ for\ Mesothelioma\ Claimants$

Evan Plotkin and Giovanni Sosa

DEAN OMAR BRANHAM SHIRLEY, LLP

J. Bradley Smith, Esq.

Bsmith@dobslegal.com

302 N. Market Road

Suite 300

Dallas, Texas 75202

Tel: (214) 722-5990

Attorneys for Mesothelioma Claimant Evan

Plotkin

*Admitted Pro Hac Vice

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re:)
) Case No. 23-ap-1092-MBK
LTL MANAGEMENT LLC,)
) Lead BK Case: 23-12825-MBk
Debtor.)

NOTICE OF AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' MOTION FOR ORDER CERTIFYING DIRECT APPEAL OF PRELIMINARY INJUNCTION ORDER OF APRIL 20, 2023 TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

PLEASE TAKE NOTICE that The Ad Hoc Group Mesothelioma Claimants'¹ Motion for Order Certifying Direct Appeal of Order of April 20, 2023 granting in part the Debtor's motion for a preliminary injunction to the United States Court of Appeals for the Third Circuit (the "Motion") shall be heard before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the District of New Jersey, on May 9, 2023 (*see* Dkt. 87), or as otherwise directed by the Court, at the United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Trenton, New Jersey 08608.

¹ The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, Christine Woodfin, and Paul Crouch (Individually and as Executor *Ad Prosequendum* of the Estate of Cynthia Lorraine Crouch) all mesothelioma claimants. *See* Adv. Pro. Case No. 23-01092-MBK Dkt. 60 (MRHFM Obj. Prelim. Inj.), Dkt. 57 (Paul Crouch Obj.), Dkt. 58 (Evan Plotkin Joinder to Obj.), and Mesothelioma Claimants' Joinder to Objection of TCC (Case No. 23-12825-MBK, Dkt. 214).

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PLEASE TAKE FURTHER NOTICE that any opposition to the Motion shall be filed with the Clerk of the Bankruptcy Court and served on all parties in interest before the hearing date of the Motion.

DATED this 24th day of April 2023.

Respectfully submitted:

MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC

/s/ Clayton L. Thompson

Clayton L. Thompson, Esq. cthompson@mrhfmlaw.com
MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC
150 W. 30th Street, Suite 201
New York, NY 10001
(800) 358-5922
Attorneys for Mesotheliama Claims

Attorneys for Mesothelioma Claimants Katherine Tollefson, Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin